

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

In re: CONGOLEUM CORPORATION,

Debtors.

Civil Action No. 09-4371
(JAP)

Bankr. Case No. 03-51524

**DEBTORS' MOTION FOR AN ORDER PURSUANT TO
BANKRUPTCY RULE 9019 AUTHORIZING AND
APPROVING THE SETTLEMENT AND POLICY BUYBACK
AGREEMENT AND RELEASE BETWEEN CONGOLEUM
CORPORATION AND SEATON INSURANCE COMPANY**

Congoleum Corporation (“Congoleum”), Congoleum Sales, Inc., and Congoleum Fiscal, Inc. (collectively, the “Debtors”) hereby move for the entry of an order pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure and §§ 363 and 105(a) of the Bankruptcy Code authorizing and approving a settlement between the Debtors and Seaton Insurance Company.

In support hereof, the Debtors are filing contemporaneously herewith a memorandum of law.

Dated: January 29, 2010

Respectfully submitted,

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